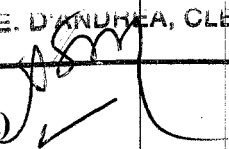


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FILED  
HARRISBURG, PA

JAN 30 2003

MARY E. D'ANDREA, CLERK  
Per 

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and  
THERESA M. PERKEY,  
Petitioners/Plaintiffs

v.

RELIABLE CARRIERS, INC.  
DANIEL JOSEPH BEMBEN,  
AND KENT,  
Respondents/Defendants

:  
: CIVIL NO. 1:00-CV-1639  
:  
: (MAGISTRATE JUDGE SMYSER)

PETITION TO AMEND JOINT CASE MANAGEMENT ORDER

1.

The Petitioner is John D. Perkey, the Plaintiff in this action.

2.

The Respondent is Reliable Carriers, Inc., Daniel Joseph Bemben, and Kent.

3.

Counsel for the parties have reviewed the status of Discovery as well as the status of the underinsured motorists cases related to this case, and counsel believes that the changes to the Joint Case Management Plan would be appropriate. Counsel for the parties have discussed this with Magistrate Judge Smyser by telephone conference call on January 28, 2003.

4.

There is a good cause for said changes. Discovery will be expected to continue beyond January 31, 2003. The companion cases of Prudential Property v. John D. Perkey and Theresa M. Perkey at 1:CV-02-0819 and John D. Perkey v. Prudential Property & Casualty have consolidated and the same deadlines will be established by an Amended Joint Case Management Order.

5.

The parties hereby request the following changes to the Case Management Order as follows:

Deadline for Discovery:	February 28, 2003
Deadline for Expert Reports:	February 24, 2003
Deadline for Supplemental Expert Reports:	March 24, 2003
Dispositive Motions:	February 28, 2003
Motion in Limine:	April 4, 2003
Pre-Trial Date:	April 17, 2003
Trial Date:	May 5, 2003

6.

E. Ralph Godfrey, Esq., counsel for the Respondent/Defendant, consents to the requested amendment as set forth herein.

**WHEREFORE**, the Petitioner/Plaintiff requests that the Court amend the Joint Case Management Plan Order as requested herein.

Respectfully submitted,

**IRWIN, McKNIGHT & HUGHES**

By: 

**Marcus A. McKnight, III, Esquire**  
60 West Pomfret Street  
Carlisle, Pennsylvania 17013  
(717) 249-2353  
Supreme Court I. D. No. 25476

Date: January 30, 2003

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>JOHN D. PERKEY and</b>	:
<b>THERESA M. PERKEY,</b>	: <b>CIVIL NO. 1:00-CV-1639</b>
<b>Petitioners/Plaintiffs</b>	:
	: <b>(MAGISTRATE JUDGE SMYER)</b>
<b>v.</b>	:
	:
<b>RELIABLE CARRIERS, INC.</b>	:
<b>DANIEL JOSEPH BEMBEN,</b>	:
<b>AND KENT,</b>	:
<b>Respondents/Defendants</b>	:

**CERTIFICATE OF SERVICE**

I, Marcus A. McKnight, III, Esquire, hereby certify that on this date a true and correct copy of the foregoing document was served upon the attorney for Plaintiffs by first-class United States Mail, postage prepaid in Carlisle, Pennsylvania 17013, addressed as follows:

E. Ralph Godfrey, Esquire  
GODFREY & COURTNEY, P.C.  
P. O. Box 6280  
Harrisburg, PA 17112  
Attorney for Defendant

By: 

**Marcus A. McKnight, III, Esq.**  
**IRWIN, McKNIGHT & HUGHES**  
Attorney ID # 70216  
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60 West Pomfret Street  
Carlisle, PA 17013  
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Dated: January 30, 2003